CAK 000 052 142 •
Part C 46-5

Department of Toxic Substances Control

Matthew Rodriquez
Secretary for
Environmental Protection

Debbie O. Raphael, Director
9211 Oakdale Avenue
Chatsworth, California 91311

Edmund G. Brown Jr.
Governor

June 28, 2012

Mr. William Adams
President Pechiney Cast Plate Inc.
c/o Eileen Burns-Lerum
8770 West Bryn Mawr Avenue
Mail Code 7J
Chicago, Illinois 60631

FEASIBILITY STUDY AND REMEDIAL ACTION PLAN - PECHINEY CAST PLATE, INC. (ALCOA CAST PLATE DIVISION), 3200 FRUITLAND AVENUE, VERNON, CALIFORNIA.

Dear Mr. Adams:

The Department of Toxic Substances Control (DTSC) has reviewed the revised draft Feasibility Study and Remedial Action Plan (RAP) dated May 7, 2012, prepared by AMEC for the above referenced site (Site). The proposed revised draft RAP specifies remedial action objectives, evaluates alternatives, and describes the alternative proposed for the Site. The objective of the RAP is to mitigate potential risk from the subsurface contaminants in soil, soil vapor and groundwater that may pose a threat to human health and the environment. To accomplish this, the draft RAP proposes soil excavation combined with soil vapor extraction and bioventing.

A formal public comment period on the Draft RAP began on May 10, 2012, and ended on June 11, 2012. DTSC received comments from three parties during the public comment period, and subsequently prepared "Responses to Comments." Modification to the Draft RAP is not necessary based on the comments received. DTSC recommends submitting revised title and other pages for RAP changing "Draft" to "Final" RAP to DTSC. DTSC hereby approves the Draft RAP as the Final Remedial Action Plan.

In addition, as a part of the approval process, DTSC prepared an Initial Study and filed a draft Negative Declaration (Neg Dec) document with the Office of Planning and Research to comply with the California Environmental Quality Act (CEQA) requirements for this remedial action project.

DTSC also held a public meeting to respond to questions/concerns raised by the public on June 7, 2012. Copies of the Final Neg Dec and Response to Comments are enclosed for your information.

Should you have any questions, please contact me at (818) 717-6609.

Sincerely,

Allan Plaza
Unit Supervisor
Brownfields and Environmental Restoration Program - Chatsworth Office

cc: Linda Conlan
AMEC
121 Innovation Drive, Suite 200
Irvine, California 92617

Mr. Gerry Pepper
Rio Tinto AUM
41158 Rimfield Drive
Palmdale, California 93551

Mr. John F. Cermak Jr.
Baker & Hostetler LLP
12100 Wilshire Boulevard, 15th Floor
Los Angeles, California 90025

Leonard Grossberg, R.E.H.S.
City of Vernon Health & Environmental Control
4305 Santa Fe Avenue
Vernon, California 90058

Carmen D. Santos
RCRA Corrective Action Office, Waste Management Division
USEPA Region 9
Mail Code WST-4
75 Hawthorne Street
San Francisco, California 94105

Department of Toxic Substances Control

Matthew Rodriquez
Secretary for
Environmental Protection

Deborah O. Raphael, Director
9211 Oakdale Avenue
Chatsworth, California 91311

Edmund G. Brown Jr.
Governor

RESPONSE TO COMMENTS

Draft Remedial Action Plan
Former Pechiney Cast Plate Inc. Facility
3200 Fruitland Avenue, Vernon, CA 90058

Introduction

On May 10th, 2012, the Department of Toxic Substances Control (DTSC) issued a public notice to accept public comments on a draft Remedial Action Plan (RAP and Negative Declaration (Neg Dec) prepared pursuant to the California Environmental Quality Act (CEQA) for the Former Pechiney Cast Plate Inc. Facility.

The Former Pechiney Site occupies about 26.9 acres within a commercial/industrial area in the city of Vernon and includes a 600,000-square foot high-precision aluminum cast manufacturing facility buildings, storage areas and parking lots. The above-ground features, including the former manufacturing facilities, were demolished in 2006 leaving the concrete floor slabs in place, and the debris was transported offsite for disposal or recycling. Remediation of remaining impacted concrete and soil will be conducted in conjunction with demolition of remaining surface slabs and below-grade features. This work will include removal of man-made structures, building slabs, pavements, footings, foundations, pits, and sumps located within the footprint of the former buildings as described in the Below Grade Demolition Plan (AMEC, 2011a) previously approved by the City of Vernon. The draft RAP is a plan to reduce the risk from subsurface contaminants in soil, soil vapor and ground water that may pose a threat to human health and the environment. The draft RAP proposes soil excavation combined with soil vapor extraction and bioventing.

Environmental investigations conducted indicate soil, soil vapor and ground water are impacted with volatile organic compounds (VOCs) that are mostly chlorinated compounds including tetrachloroethene (PCE), trichloroethene (TCE), 1,2-Dichloroethane (1,2-DCA), petroleum hydrocarbons (Stoddard Solvent), polychloro biphenyl , 1,2,4-trimethyl benzene (1,2,4-TMB), 1,3,5-trimethyl benzene 1,3,5-TMB), chloroform and metals. The Site is divided into 6 Phase Areas (I through VI), each of which was occupied by various buildings and impacted by various Chemicals Of Concerns (COCs). Manufacturing has not been performed at the Site since 2006, when Pechiney purchased the Site and subsequently closed the Vernon facility. The Site is currently a vacant lot.

In 2008, the California Regional Water Quality Control Board (RWQCB) determined that the contamination associated with chlorinated solvents in soil and ground water at the Site, including the area of the former Stoddard solvent underground storage tanks (USTs), should be addressed under the oversight of DTSC. In July 2010, DTSC issued an Imminent and Substantial Endangerment Determination and Consent Order to Pechiney to determine the full nature and extent of contamination and implement cleanup activities under DTSC oversight addressing the Stoddard solvent impacts under this Order.

DTSC prepared Initial Study and draft Negative Declaration pursuant to CEQA that states the proposed remedial actions will not have a significant effect on the environment.

DTSC announced a public notice for a 30-day public comment period. It was published in the Eastern Group Publications in their 11 newspapers including the Vernon Sun and Eastern Sun newspapers in both English and Spanish. The first notice was published on May 10th and the "change date/venue" postcard on May 31st. The 30-day public comment period ended on June 11, 2012. Before DTSC can approve the draft RAP, DTSC must first respond to all public comments received. Public comments received during the formal public comment period are indicated verbatim in this Response to Comments document and DTSC's formal responses to received public comments are provided below.

Comments 1-7: Received May 7, 2012 from Mr. Leonard Grossberg, Interim Director/Health Officer City of Vernon Health & Environmental Control, 4305 Santa Fe Avenue, Vernon, California 90058.

Comment 1: Soils containing PCBs at levels greater than 23 mg/kg are proposed to be left in place at 15 feet below grade and deeper. This may restrict the possible redevelopment of the site, as excavation and compaction of PCB impacted soils may occur and deep footings or piers may be installed.

DTSC Response: Disturbances of the soil below 15 feet for any construction and redevelopment will require notification to DTSC and the U.S. Environmental Protection Agency Region 9 (USEPA). In addition, a soil management plan will be submitted as required by DTSC and the USEPA for approval. The soil management plan must be implemented to ensure that soils contaminated with PCBs that may be encountered during construction or post construction maintenance activities are removed and disposed of in accordance with all applicable federal, state, and local regulatory requirements. Further, the PCB cleanup goal for the native soil at the depth between 5 to 15 feet below ground surface is 23 mg/kg. This PCB concentration has no impact on either ground water or the construction workers during any redevelopment process and that concentration equates to a 10^{-5} carcinogenic risk level. The Site will be restricted for industrial / commercial uses and such restriction will prohibit residential use including, hospitals, schools and child care centers.

Comment 2: EHD's policy is that once soils or concrete containing contaminants above the established threshold limits (23 mg/kg of PCB's) have been removed from a location, those materials must be properly disposed of and not placed back into the ground. We read the RAP to allow re-use of such materials, to which EHD objects.

DTSC Response: DTSC issued an Imminent and Substantial Endangerment Determination and Consent Order (Order) in July 2010 to Pechiney. According to this Order (Section 2.6, Exposure Routes), "certain concrete containing PCBs present in former building slab areas of the Property may be demolished on Site, crushed, and potentially disposed on site as fill soils in excavations and foundation removal areas".

Soil and concrete containing PCB concentrations greater than 23 mg/kg will not be reused as fill material at the Site. According to the draft RAP, PCB-impacted soil from ground surface (0 feet) to a depth of 5 feet bg with PCB concentrations greater than 3.5 mg/kg, and soil from 5 to 15 feet bgs with PCB concentrations greater than 23 mg/kg will be excavated and transported off-site for disposal at a permitted facility.

The concrete with PCB concentrations greater than 3.5 mg/kg will be demolished and transported off site for disposal at a permitted facility.

Comment 3: We understand that Pechiney plans to reuse material and native soils with PCB concentrations greater than 1.0 mg/kg but less than 3.5 mg/kg throughout the site at depths ranging from zero to five feet below grade, and to cover the same with a one foot "interim clean cap." EHD believes that the use of such contaminated materials at shallow depths is not adequately protective of health and the environment, especially since construction at the property likely will expose constructions workers during grading, trenching, and excavating work. We prefer a five foot interim clean cap to not expose workers during re-development.

DTSC Response: The USEPA approved the PCB remediation goal of 3.5 mg/kg based on current Cal/EPA toxicity criteria for PCBs and protection of human heath assuming a commercial/industrial land use and a construction worker exposure scenario. In addition, DTSC-recommended reasonable maximum exposure (RME) assumptions were incorporated into the risk analysis. The 3.5 mg/kg remediation goal equates to the 10^{-5} carcinogenic risk level mandated by DTSC. The 1.0 mg/kg PCB threshold only applies to PCB--impacted concrete—not native soil. Native soils containing PCBs above 1 ppm will not be reused at the Site.

The low-concentration (greater than 1 mg/kg but less than 3.5 mg/kg) PCB-impacted concrete will be used as "restricted fill" at one location where soils contaminated with PCBs exceeding 23 mg/kg will be left in place. This is the only PCB-impacted material planned for on-site reuse which also will not be placed anywhere at the site at 0 to 5 feet below grade. A concrete barrier will be placed at 15 feet atop the soils in the one location where PCBs exceed 23 mg/kg and the "restricted fill" will be added atop that

barrier. A minimum of 5 feet of "clean" crushed concrete (PCB concentrations equal to or less than 1 mg/kg) will be placed above the "restricted fill" and at 5 feet below grade.

Comment 4: EHD objects that the Revised RAP and FS propose to leave Stoddard solvents in deep soil and to attempt to remediate them over a long period of time using SVE and bioventing. This approach is known as "Alternative 3" in the Revised RAP and FS. EHD objects to Pechiney's proposal because the time frames for completing Alternative 3 and the effectiveness of the plan are uncertain and the end point criteria for DTSC to issue a No Further Action Letter ("NFA letter") are not set forth. Alternative 2, which EHD prefers, would address the Stoddard solvent issue in a more certain and timely way by excavating and removing deep soils impacted with those solvents (and other COCs).

DTSC Response: SVE and bioventing are well-proven technologies and U.S. EPA-defined presumptive remedies for remediation of petroleum hydrocarbon compounds, such as Stoddard solvent. SVE removes the volatile and generally more toxic constituents in the petroleum hydrocarbon compounds. The volatile constituents comprise only a portion of the Stoddard solvent. Bioventing, or in simple terms, aeration of the underlying soil, provides oxygen to indigenous hydrocarbon degrading bacteria which are ubiquitous in the environment to promote the growth of bacteria populations capable of degrading petroleum hydrocarbons. Thus the fraction of petroleum hydrocarbon compounds treated using SVE/bioventing combined is greater than the fraction treated using SVE only.

Since Alternative 2 is the most expensive remedial process, DTSC considers Alternative 3 is appropriate and cost saving remedy which will work equally well as Alternative 2 in excavation of soils up to 15 feet and removal of volatiles and Stoddard below 15 feet by SVE/Bioventing remedies.

Comment 5: As you know, DTSC has made findings of potential risks to health and the environment in its Imminent and Substantial Endangerment Order ("Order"). Especially in light of this Order and these findings, EHD will require that Pechiney obtain an NFA Letter from DTSC with respect to the Facility. In this connection we note that the Order provides that Pechiney must conduct a review of the status of the remediation five years after the system has started up, and every five years thereafter to determine whether the remediation continues to be protective of human health and the environment. DTSC apparently may impose additional requirements in the future if required to address such risks.

DTSC Response: After implementation of RAP, the site will have Land Use Covenant and O&M in place which requires a five year review. DTSC will evaluate the condition yearly for first two years and later after three years.

Comment 6: In addition to addressing EHD's comments and concerns above, Pechiney should revise its RAP to address expected timeframes for completion of the

remediation, alternatives for remediation if the proposed remediation alternative chosen does not adequately remediate the contamination, and its agreement to seek and obtain an NFA letter from DTSC, with an estimated date for accomplishing this goal.

DTSC Response: DTSC does not require any revision of the RAP because soon after the implementation of the RAP, SVE/Bioventing will start working followed by an LUC and O&M plan which will document the timeframe monitoring and evaluation. As mentioned in response to the comment 4 above, the SVE/bioventing method is a presumptive remedy to address petroleum hydrocarbons in soil.

Comment 7: EHD notes that the types of objections raised above have been made previously by EHD, and/or City of Vernon since 2006, when Pechiney started demolition work at the Facility. On many occasions EHD and City of Vernon have stated their views that contaminated soil, concrete and other building materials must be removed from the site and that all COCs must be remediated and the work done so in a comprehensive and timely way. In our view the Revised FS and RAP continue to be inadequate.

DTSC Response: See Response to Comments 1-6 above. DTSC believes that the approved RAP is protective of human health and the environment and the cleanup levels are consistent with the current and future land use of the site. DTSC will continue to monitor the progress of the cleanup to ensure that progress is being made to achieve the cleanup goals and may modify the approved remedy, if necessary, to attain the cleanup goals at a reasonable amount of time.

Comment 8: Received on May 16, 2012 from Ms. Phung Ly, Water Quality Specialist, Water Quality Replenishment District of Southern, 4040 Paramount Boulevard, Lakewood, CA 90712.

Please add me to the former Pechiney Cast Plate Facility mailing list.

DTSC Response: Will be added.

Comment 9: Received on June 4, 2012 from Mr. Harold Bringman, Environmental Consultant, Barksdale, Inc., 3211 Fruitland Avenue, Los Angeles, CA 90058

At Barksdale Controls Products we have 218 employees. Their safety is of prime concern. We are also a manufacturing facility, and are required to have a SWPPP in place, and prepare Annual Storm water Reports to the Los Angeles RWQCB. Included among the various constituents that we have to take Storm water samples for are Fe, Al, Zn, and N+N. The Agency in the last 2 years has sent correspondence to many of the manufacturing companies noting enforcement action for violating the federal guidelines for Storm water discharges. A major effort to keep parking lots clean and free of residues by implementing additional Best Management Practices (BMP, s) is one way to further comply.

Our parking lot and cars were already contaminated by water mist with rusty metal dust and other contaminants when the Pechiney metal buildings were demolished and torn down several years ago. The City of Vernon was notified, as well as the contractor and SCAQMD.
We are concerned that the excavation of soils can expose the contaminants present, if not controlled properly. We would also appreciate a report on the suspected contaminants. Are there any REACH, RoHS, or other chemical present? Are lead, Asbestos Chrome or PCB's an issue?

DTSC Response: During the excavation activities the necessary storm water controls (BMPs) will be in place and maintained in accordance with the site-specific Storm Water Pollution Prevention Plan (SWPPP). The City of Vernon is located within the South Coast Air Quality Managing District (SCAQMD), and it is SCAQMD's responsibility to ensure that State and Federal ambient air quality standards are met. SCAQMD is a non-attainment area for the State Ambient Air Quality Standards for ozone, respirable particulate matter (PM10 and PM2.5), nitrogen dioxide, and lead. During the below-grade demolition and soil excavation work air monitoring and dust control measures will be conducted as detailed in the site-specific Perimeter Air Monitoring Plan (PAMP) and RAP Air monitoring. Perimeter air monitoring will be conducted to monitor PM10 particulates, lead; arsenic, PCBs, and VOCs (specifically TCE; PCE; benzene; and 1,2,4 – TMB; and 1,3,5 – TMB) emissions. Based on remedial investigation data for the Site, these are the key chemicals of concern that may be present in emissions during below-grade demolition and/or remedial excavation work.

Dust control measures will include misting soil with water, covering inactive soil stockpiles, removing truck/tire debris from tires and under the trucks leaving the project site, and covering trucks loads before leaving the project site. Dust suppression and vapor and/or odor control will be implemented as needed using the requirements outlined in the PAMP and RAP. Dust control measures will rely on wet methods (water spray, water misting) to control dust emissions. Similar dust control measures will also be applied to concrete crushing activities. Potential VOC emissions during soil excavation work will be monitored in accordance with SCAQMD Rule 1166.

Perimeter air sampling methods and action levels covered under the PAMP are summarized below for real-time monitoring using hand held field instruments and time-integrated monitoring using laboratory analysis.

REACH and RoHS relates to the restriction of six hazardous substances in the manufacture of various types of electronic and electrical equipment and a does not apply to the soil excavation work. Soil excavation activities outlined on the RAP will be conducted at isolated areas of the site.

The suspected contaminants associated with the soil excavation activities include arsenic and polychlorinated biphenyls (PCBs). Other contaminants present in soil at the site include volatile organic compounds and petroleum hydrocarbons.

CALIFORNIA ENVIRONMENTAL QUALITY ACT
NEGATIVE DECLARATION

Department of Toxic Substances Control
Brownfields and Environmental Restoration Program
9211 Oakdale Avenue
Chatsworth, CA 91311

Subject: ☐ DRAFT ☒ FINAL ☐ MITIGATED

Project Title: Remedial Action Plan for Pechiney Cast Plate, Inc. site (Alcoa Cast Plate Division Site)

State Clearinghouse No.:

Project Location: 3200 Fruitland Avenue, Vernon, California 90058-3718; the Site is comprised of approximately 26.9 acres (including Assessor Parcel Numbers 6301-008-010, -011, -012, and -013, which was divided into Parcels 6, 7, and 8)

County: Los Angeles

Project Description: The Department of Toxic Substances Control (DTSC) is proposing to approve a Remedial Action Plan (RAP) pursuant to authority granted under Chapter 6.8, Division 20, California Health & Safety Code (H&SC) on the former Pechiney Cast Plate, Inc. facility (Pechiney) located in the City of Vernon, California. The Site was formerly occupied by aboveground structures which encompassed approximately 600,000 square feet of the Project area. The Pechiney facility ceased to operate in January 2008 and in November 2008 demolition and removal of above ground structures were completed Remains at the Site are the concrete building slabs and surrounding asphalt pavement, and the Site remains secured by locked perimeter fencing. The objectives of the RAP includes the remedial activities related to addressing polychlorinated biphenyl (PCB)-impacted concrete during demolition of below-grade features/structures, and remediating impacted soil and soil vapor during and following below-grade demolition.

Previous remedial investigations (RIs) conducted at the Site identified impacts to concrete, soil and groundwater resulting from former aluminum manufacturing operations and included:

- concrete building slabs impacted with PCBs;
- soil impacted with total petroleum hydrocarbons (TPH; including Stoddard solvent compounds), metals, PCBs, arsenic, and volatile organic compounds (VOCs);
- soil vapor impacted with VOCs and Stoddard solvent compounds; and
- groundwater (first water bearing unit at a depth of approximately 150 feet) impacted with VOCs.

The proposed project remediation activities include, but are not limited to:

- Demolition, excavation and off-site disposal of impacted soil and concrete containing PCBs and/or arsenic to depths of approximately 15 feet. Deeper soil (at depths greater than 15 feet) impacted with PCBs above the remediation goal would be left in place. PCB-impacted concrete slabs with PCB concentrations greater than 3.5 mg/kg will be transported to an offsite disposal facility designated to receive PCB-containing wastes. PCB-impacted concrete at concentrations greater than 1.0 mg/kg and less than 3.5 mg/kg would be crushed and deposited onsite as restricted-use fill material. Non-PCB-impacted concrete (less than or equal to 1.0 mg/kg) would be crushed and reused onsite as unrestricted use fill material.

- Backfill excavated areas with on-site, recycled, crushed concrete demolition debris.

- Installation and operation of a soil vapor extraction (SVE) system to remediate shallow (up to 50 feet) and deep (up to 90 feet) soil impacted with VOCs (northern portion of the Site in the Phase I area).

- Installation and operation of an SVE/Bioveneeting system to remediate shallow soil impacted with Stoddard solvent (southern portion of the Site in the Phase IIIb and IV areas).

- Ongoing sampling and monitoring of air, soil, and water to ensure remediation goals are met and to ensure the health and safety of the construction workers and public.

Finding Of Significant Effect On Environment: *(An Initial Study supporting this finding is attached.)*

Refer to Initial Study and Remedial Action Plan for details.

Mitigation Measures:

Refer to Initial Study and Remedial Action Plan for details.

Branch Chief Signature	Date
	6/12/12

Hamid Saebar	Supervising Hazardous Substances Engr II	(818) 717-6530
Branch Chief Name	Branch Chief Title	Phone #